CORRES. CONTROL	
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DOE ORDER #	
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DIST.	KAISER+HILL
BERARDINI, J. X	November 4, 2004 04-RF-01139
BRAILSFORD, M.D ERRERA, D.W. X ERRI, M.S.	
FULTON, J.C. GIACOMINI, J	
HALL, L. MARTINEZ, L.A.	Mr. Joseph A. Legare, Director
PARKER, A.M. POWERS, K.	- Project Management Division - DOE, RFPO
SCOTT, G.K.	- DOL, RITO
SPEARS, M.S.	- Mr. Steve Gunderson
OORHEIS, G.M.	Colorado Department of Public Health and Environment
MEMLET, K.L. X X	4300 Cherry Creek Drive South
HORNBURG, AMY X	Denver, CO 80246-1502
	- IMr. Mark Aguilar
	U.S. Environmental Protection Agency
	-999 18 th Street, Suite 300
	Denver, CO 80202-2466
	TRANSMITTAL OF THE DRAFT NFAA JUSTIFICATION FOR PAC 000-505,
	STORM DRAINS – KLW-037-04
	Enclosed are copies of the Draft NFAA Justification for PAC 000-505, Storm Drains. We
COR CONTROL X X	will contact your staff to schedule a meeting the week of November 15 to resolve
NASTE REC. CTR.	comments and finalize the text.
PATS/130	
LASSIFICATION:	If you have any questions, please contact me at extension 9883.
JCNI JNCLASSIFIED	16 fee Marland
ONFIDENTIAL	Karen L. Wiemelt
AUTHORIZED CLASSIFIER	Manager, Environmental Restoration Programs
SIGNATURE	
Exemption - CEX-105-01	_KLW:dm
Date	Orig and 1 so Jacoph Lagora
N REPLY TO RFP CC	Orig and 1 cc – Joseph Legare cc: Norma Castaneda
N REPLITIO REPUCE NO:	Co. I tolina Casaileaa
<u> </u>	- Enclosures:
ACTION ITEM STATUS	As Stated
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TR APPROVALS:	
ORIG & TYPIST INITIALS	ADMIN RECORD

Kaiser-Hill Company, L L C Rocky Flats Environmental Technology Site, 10808 Hwy. 93 Unit B, Golden, CO 80403-8200 ● 303-966-7000

IA-A-002434



Revision 7/04

ORIG & TYPIST INITIALS

NO FURTHER ACCELERATED ACTION JUSTIFICATION

FOR STORM DRAINS

PAC REFERENCE NUMBER: 000-505

IHSS Number:

Not Applicable

Operable Unit

Industrial Area

IHSS Group

000-3

Unit Name:

Storm Drains

Approximate Location:

Not Applicable

Date(s) of Operation or Occurrence

1952 - Present

Description of Operation or Occurrence

In 1999, storm drains were identified as a Potential Area of Concern (PAC). At that time, 239 storm drains were estimated to be present at RFETS (Figure 1)¹. The storm drains provide site drainage from roads, parking lots, and other areas and discharge into the creeks and drainages north and south of the Site. Some footing drains from site buildings also discharge to storm drains (DOE 1999a).

Physical/Chemical Description of Constituents Released

The storm drains were designed to convey surface water away from the Site but unplanned accidental discharges to the system have occurred. Several incidents have been reported and include the following contaminant release areas (DOE 1999a):

- 1. Potential contamination at Building 771 storm drain,
- 2. Wash water from the degreasing of depleted uranium parts near Building 991,
- 3. Release of nitric acid/nitradd² waste solution from Building 460,

¹ The difference between Figure 1 and the figure in the original PAC 000-505 description (DOE 1999a) is that the Interceptor Trench System [ITS] has been removed. The ITS is an underground pipe network in the northeastern corner of the Industrial Area that directs contaminated groundwater to the Solar Ponds Plume Treatment System. The part of the ITS that collected surface water was closed. Technically, this is not a system of storm drains. It is also an integral part of the groundwater Interim Measure/Interim Remedial Action at the Solar Evaporation Ponds, and therefore, its operation and ultimate disposition is covered under a separate decision document.

² Nitradd is a mixture of nitric acid, acetic acid, and ammonium bifluoride.

- 4. Release of miscellaneous materials into the storm drain west of Building 446, PAC 400-803.
- 5. PCB runoff from Building 707,
- 6. PCB runoff from Building 444 Courtyard, and
- 7. Building 776 Storm Drain.

Various waste liquids from laundry and decontamination facilities, the analytical laboratory, radiography sinks, and runoff from the Building 771 roof and ground areas were discharged into the Building 771 storm drain from 1953 until mid 1957. Periodic releases from laundry holding tanks occurred until 1965. Radionuclide concentrations in soil ranged from 130 to 2000 disintegrations per minute per gram (d/m/g) and in sediment from 60,000 to 200,000 d/m/g (DOE 1999a).

Cleaning operations were performed on depleted uranium parts in the open courtyard of Building 991 during the late 50's and early 60's. Parts were degreased with acetone and other organic solvents. Spills and water wash downs were flushed into the storm drains which discharged into South Walnut Creek (DOE 1999a).

In April 1989, between 5 and 7 gallons of nitric acid/nitradd waste solution from Building 460 entered a storm drain that feeds into Pond C-2 (DOE 1999a).

Miscellaneous materials including silver paint and possibly oil and aluminum paint were dumped into the storm drain immediately west of Building 446 (DOE, 1999a).

Although there were no reported specific contaminant release events to a Building 371 storm drain or ditch, these drains and ditches were sampled in 1987 and they represent an 8th potential contaminant release area in PAC 000-505. The results of 1987 sample analyses are listed in Table 1. It is not known if samples were collected during a storm event or from standing water (DOE 1999a).

Table 1 Analytical Results from Building 371 Storm Drains and Ditches

Sample Location	Analyte	Results				
Storm Drains	Gross Alpha	24 +/- 8 pCi/L				
	Gross Beta	64 +/- 4 pCi/L				
	рН	6.8				
	NO 3 as N	0.53 mg/L				
Ditches (North)	Gross Alpha	18 +/- 16 pCi/L				
	Gross Beta	14 +/- 34 pCi/L				
	NO 3 as N	1.27 mg/L				
Ditches (South)	Gross Alpha	19 +/- 13 pCi/L				
	Gross Beta	16 +/- 35 pCi/L				
	NO 3 as N	0.33 mg/L				

Responses to Operation or Occurrence

Of the eight contaminant release areas noted above, a response to the occurrence is documented only for the first and the fourth, as noted in the following two paragraphs, respectively.

In September 1970, two 55-gallon drums of contaminated soil were removed from the Building 771 storm drain area and additional soil was removed in February of 1971. At least 50 drums of contaminated soil were eventually removed. Remaining soil was surveyed and results ranged from 120 to 3000 d/m/g (DOE 1999a).

The contractor was required to cleanup up the storm drain ditch west of Building 446 and disposition the waste. No other documentation could be found detailing the responses to potential releases from this occurrence (DOE 1999a).

Fate of Constituents Released to Environment

PAC 000-505 has been assessed to render a No Further Accelerated Action (NFAA) determination using the following approach. As discussed above, there are eight contaminant release areas associated with PAC 000-505. Contaminant release areas 1 through 5 and 8 have been characterized and/or remediated in accordance with the Industrial Area Sampling and Analysis Plan (IASAP) (DOE 2001) and the Environmental Restoration (ER) Rocky Flats Cleanup Agreement (RFCA) Standard Operating Protocol for Routine Soil Remediation (ER RSOP) (DOE 2003a), and have approved NFAAs. Contaminant release areas 6 and 7 have been or will be characterized and/or remediated in accordance with the IASAP and ER RSOP; however, in addition, the storm sewers will be removed under the Decommissioning Program Plan (DPP) (DOE 1998) because of potential contamination within the sewers. Lastly, because PAC 000-505 encompasses other storm drains not associated with the specific contaminant release areas, sediment, surface soil, and subsurface soil data associated with these storm drains have also been evaluated to make the NFAA determination for PAC 000-505. The NFAA evaluation is discussed in detail below.

CONTAMINANT-RELEASE AREAS NOT REQUIRING STORM SEWER REMOVAL

The following six contaminant-release areas either have already been addressed through accelerated action activities, or supporting data indicates the contaminant release is not significant (Contaminant Release Area #8). The data support that storm sewer removal is unjustified on the basis of soil contamination. They are as follows:

Contaminant-Release Area #1 - 771 Building Storm Drain. This contaminant-release area is PAC 700-143 (771 Outfall). PAC 700-143 was proposed for NFAA (DOE 2004a). The Subsurface Soil Risk Screen (SSRS) and (Wildlife Refuge Worker) WRW (Action Levels) ALs (DOE et al 2003) were applied to the characterization data for this PAC. The risk screen did not indicate that soil removal at the outfall area was necessary. Surface and subsurface soil constituents that were above background were at concentrations well below the WRW ALs. Constituents above background in local alluvial groundwater were at concentrations well below the Tier I groundwater ALs, and

almost none of these constituents were identified as being above background in surface and subsurface soil at the PAC. It was concluded that previous remedial activities at this IHSS effectively addressed the release of contamination. DOE received concurrence from CDPHE on the NFAA status for the site on September 7, 2004 (CDPHE 2004a).

Contaminant-Release Area #2 - Wash Water from Degreasing of Depleted Uranium Parts near Building 991. This contaminant-release area is IHSS 900-173 (Radioactive Site Building 991). IHSS 900-173 is part of IHSS Group 900-1. Characterization of IHSS Group 900-1 was conducted in accordance with IASAP Addendum #IA-03-03 (DOE 2003b). Analytical results from the characterization of this IHSS are presented in the Closeout Report for IHSS Group 900-1 (DOE 2004b)³. Based on analytical results and the SSRS, an NFAA was proposed for IHSS Group 900-1, which includes IHSS 900-173. DOE received concurrence by CDPHE of the NFAA status for IHSS Group 900-1 on March 31, 2004 (CDPHE 2004b).

Contaminant-Release Area #3 - Release of Nitric Acid/Nitradd Waste Solution from Building 460. This contaminant-release area is IHSS 400-205. IHSS 400-205 is part of IHSS Group 400-5 and was investigated in accordance with IASAP Addendum #IA-03-14 for IHSS Groups 400-5 and 400-6 (DOE 2003c). IHSS 400-205 is being addressed in the Data Summary Report for IHSS Group 400-5. Therefore, it is unnecessary to address this contaminant-release area in this NFAA evaluation.

Contaminant-Release Area #4 - Release of Miscellaneous Materials into the Storm Drain West of Building 446, PAC 400-803. In accordance with the IASAP Addendum #IA-04-14 for IHSS Group 400-4 (DOE 2004c), which includes PAC 400-803, characterization samples were collected and analyzed. Analytical results from the characterization are presented in the Data Summary Report for IHSS Group 400-4 (DOE 2004d). Based on analytical results and the SSRS, DOE received concurrence by CDPHE of the NFAA status for IHSS Group 400-4 on August 23, 2004 (CDPHE 2004c).

Contaminant-Release Area #5 - PCB runoff from Building 707. This contaminant-release area is PAC 700-1103. This PAC was remediated (DOE 1997), and the results from extensive soil sampling in the area proved that PCB-contaminated rainwater from the Building 707 rooftop did not migrate to the storm drain located over 100 ft. downgradient. Based on the site remediation and confirmation data, the site was proposed for NFAA. DOE received concurrence from CDPHE on the NFAA status for the site on May 6, 2004 (CDPHE 2004d).

Contaminant-Release Area #8 - Building 371 Storm Drains. The analytical data provided in Table 1 does not indicate a need for accelerated action: The gross alpha and beta concentrations in the storm drains are of the same order of magnitude as the surface water ALs (gross alpha [11 pCi/L] and gross beta [19 pCi/L]), only gross alpha is above the surface water AL in the ditches (and by a small margin [within a factor of 2]), and nitrate is well below the surface water AL (10 mg/L). Also, there does not appear to be any adverse impacts to surface water quality in the unnamed drainage just east of Building 371/374. A new performance monitoring location (SW018) was established in

³ Characterization results for IHSS 900-173 indicated that analytes in soil were below the WRW ALs. Accelerated actions performed at IHSS Group 900-1 addressed other IHSSs, PACs, and UBCs.

October 2003 at this location⁴. As shown in Table 2, americium-241 (Am-241), plutonium-239/240 (Pu-239/240, and total uranium at SW018 are all well below their surface ALs of 0.15 pCi/L, 0.15 pCi/L, and 10 pCi/L, respectively.

Table 2. Radionuclide Concentrations at SW018

Sample Collection Date	Am-241 (pCi/L)	Pu-239/240 (pCi/L)	Total Uranium (pCi/L)
10/13/2003	0.013	0.000	1.835
11/10/2003	0.000	0.000	2.584
12/18/2003	0.007	0.006	2.371
3/8/2004	0.004	0.021	1.950
4/12/2004	0.010	0.016	1 <u>.7</u> 67
4/26/2004	0.008	0.017	2.953
5/11/2004	0.032	0.053	2.976
6/3/2004	0.020	0.040	1.849
6/18/2004	0.021	0.067	1.764
6/28/2004	0.006	0.022	2.438

CONTAMINANT-RELEASE AREAS WITH PROPOSED STORM SEWER REMOVAL

The following two contaminant release areas have been or will be addressed through accelerated actions; however, the storm sewers will be removed under the D&D program and a contact record will be generated to document the planned remedial activity.⁵ The rationale for storm sewer removal is provided below.

Contaminant-Release Area #6 - PCB Runoff from Building 444 Courtyard. This contaminant-release area is PAC 400-801. The PAC represents the release of transformer oil from a transformer that was located on the roof of Building 447. Downspouts were located north of the transformer's former position, which would have allowed PCB contaminated runoff to infiltrate soils adjacent to Building 447. A storm drain is situated roughly twenty feet from the building and may have also been contaminated (DOE 1992). As part of the Site-Wide Evaluation of Known, Suspect, and Potential Environmental Releases of PCBs conducted in July of 1991, a sediment sample was collected from the storm drain sump, and the analytical results indicated the presence of PCBs at 54 ppm. This exceeds the WRW AL of 12.4 ppm.

The storm drain is in PAC 400-801, which is included in IHSS Group 400-3. This IHSS Group was characterized in accordance with IASAP Addendum #IA-03-06 (DOE 2003d). Based on the results presented in the Data Summary Report (DOE 2003e), IHSS

⁴ This drainage receives runoff and storm drain discharge from the east side of Building 371/374. The station was established for monitoring potential Building 371/374 D&D impacts on water quality per the Integrated Monitoring Plan.

⁵ D&D activities are implemented pursuant to the Decommissioning Program Plan (DPP) (DOE 1998). The DPP describes the process for determining the type of RFCA decision document required for demolition of a RFETS' building. For a highly contaminated building (plutonium production facility), a Decommissioning Operation Plan (DOP) is required. For other radioactive-contaminated buildings, a Notification Letter is issued pursuant to the RFCA Standard Operating Protocol (RSOP) for Facility Disposition (DOE.2004f).

Group 400-3 has an approved NFAA (CDPHE 2003a). However, because of the PCB contamination in sediment within the storm sewer, the storm sewer and enclosed sediment will be removed, characterized as necessary for disposal, and disposed off Site in accordance with RSOP Notification Letter 04-RF-00979 for Building 447 (DOE, 2004e).

Contaminant-Release Area #7 - Building 776 Storm Drain. This contaminant-release area is in IHSS 700-150.2 (S), Radioactive Site West of Buildings 771 and 776. The south (S) designation refers to the radioactive site west of Building 776. On May 11, 1969, a fire occurred in Building 776-777. The IHSS is the result of plutonium being tracked outside of Building 776 by firefighting and support personnel, and was detectable on the ground west of the building. Rain carried the contamination into the soil, and although not specifically stated in the IHSS description, presumably into the storm drain that runs along the western side of the building. The storm drain was grouted after the fire. IHSS 700-150.2 (S) is part of IHSS Group 700-3 and is being investigated in accordance with IASAP Addendum #IA-03-04 (DOE 2003f). Any necessary soil remediation will be conducted in accordance with RSOP Notification #04-04 (DOE 2004g). Because of the potential for the storm sewer to contain plutonium-contaminated sediment, possibly at a concentration that exceeds the WRW AL, the storm sewer will be removed. Building 776-777 will be demolished in FY05 in accordance with the Building 776/777 Closure Project DOP (DOE 1999b). Pursuant to the DOP, the storm drain and enclosed sediment will be removed, characterized as necessary for disposal, and disposed off Site.

POTENTIAL CONTAMINATION IN SOIL/SEDIMENT AT OTHER STORM DRAINS

Although the identification of storm drains as a PAC is a result of the reported releases discussed above, PAC 000-505 does encompass other storm drains. Accordingly, sediment, surface soil, and subsurface soil data not associated with the specific release areas have been examined to further evaluate the appropriateness of NFAA for this PAC. These data have been collected as part of historical investigations within the Industrial Area or for other IHSS Group characterizations/remediations. The sample locations are near the inlet and outlet of storm drains or beneath the invert elevations of the storm drains (subsurface soil) because the data at these locations will be most representative of potential contaminant releases from the storm drain system.

The data for the evaluation was identified as follows:

- 1. Using a Geographic Information System, all sample location codes for surface soil and sediment samples that were collected within 5 feet of the inlet or outlet of a storm drain were identified. Sample location codes for subsurface soil samples collected anywhere within 5 feet of a storm drain line were also identified.
- 2. Samples from within the IHSSs (contaminant release areas) noted in the previous section were then eliminated from further evaluation.
- 3. Storm drain depths were compared to subsurface soil sample depths, and all subsurface soil samples with end depths above the invert depths of the storm

- drains⁶ were eliminated from further evaluation because they were unlikely to be representative of soil potentially impacted by a storm drain release.
- 4. All samples considered no longer representative (NLR) [soil removed during prior accelerated action remedial activities] or being specifically used to evaluate the need for an IHSS Group accelerated action soil removal were eliminated from further evaluation.
- 5. Data for all remaining samples were extracted from the Soil Water Database (SWD).

Figure 2 shows all sample locations where data has been retained for evaluation in accordance with the above noted criteria. Figure 2 also shows the IHSSs where contaminant releases to storm drains have already been dispositioned or will be dispositioned as discussed in the previous section. Figure 3 shows the sample locations that were eliminated by applying criterion 4 above. The rationale for the elimination of these data for this NFAA evaluation is as follows:

Sample Location Codes Surface Soil	Rationale for Elimination
CH47-000, CH47-001	NLR from previous OPWL soil removal conducted at Tank 207 in accordance with Notification #03-14 for IHSS Group 000-2 (DOE 2003g) (Closeout Report pending)
01595, 01495, SS000295,	Report pending)
SS000495, SS000595, SS000695	NLR from IHSS Group 400-8 soil removal (DOE 2004h)
Sediment	·
SED124, 10499	Sediment was recently removed as part of IHSS Group 700-11 accelerated action (Notification #IA-04-10) (DOE 2004i), which was approved by CDPHE (CDPHE 2004e)
Subsurface Soil	
CQ40-000 (4.5' – 6.5')	Data collected in accordance with BZSAP Addendum #BZ-02-01 for IHSS Group 900-2 (DOE 2002), and currently under evaluation
CH47-001 (3.5' – 4.5')	NLR from previous OPWL soil removal conducted at Tank 207 as noted above

⁶ Since 2001, when the first RFETS Storm Water Pollution Prevention Plan (SWPPP) was certified by the Site in accordance with the RFETS' NPDES Permit requirements, an annual Comprehensive Site Compliance Evaluation (CSCE) inspection has been performed for the storm drains. Through the conduct of annual CSCEs, a Storm Water Culvert and Infrastructure database has been prepared, which was used to identify storm drain depths, where available. The average depth of 3.9 feet for culverts with known depths was used as the estimated depth for culverts with unknown depths.

The analytical program for all retained sample location codes is summarized in Table 3. As can be seen, sediment, surface soil, and subsurface soil samples were analyzed for metals, radionuclides, volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), pesticides, and polychlorinated biphenyls (PCBs). All analytical groups are well represented in each medium.

Tables 4, 5, and 6 summarize the sediment, surface soil, and subsurface soil data, respectively. These tables show analytes that were detected above background. Background levels for inorganic constituents in surface soil are from the Geochemical Characterization of Background Surface Soils: Background Soils Characterization Program (DOE 1995). Background levels for inorganic constituents in sediment and subsurface soil are from the Background Geochemical Characterization Report (DOE 1993). All background values used for comparison are the mean background value plus two standard deviations. Any detection of an organic compound is considered an above background level observation. The following decision rules were applied to the calculation of the summary statistics provided in Tables 4, 5, and 6:

- 1. Data rejected during validation and replicates were eliminated from the data set before computing statistics.
- 2. The maximum value is the highest detected value observed.
- 3. The average was computed using only data that are above background concentrations.

Figures 4, 5, and 6 show all sediment, surface soil, and subsurface soil data for analytes that were detected above background.

Sediment Assessment

As shown in Table 4 and Figure 4a and 4b, metals and to a lesser extent radionuclides and polynuclear aromatic hydrocarbons (PAHs) are above background in the sediments. However, metal and radionuclide concentrations are generally near background levels, and are always well below the WRW ALs. PAHs in the sediments are not unusual because the Industrial Area is largely paved with asphalt which contains high concentrations of PAHs. PAHs would be expected in runoff, and thus, in the sediments. Nevertheless, concentrations are low relative to the WRW ALs.

Surface Soil Assessment

As shown in Table 5 and Figure 5a and 5b, metals, radionuclides and PAHs are above background in surface soil. However, like sediment, metal and radionuclide concentrations are generally near background levels, and are always well below the WRW ALs. PAHs in the sediments are also well below WRW ALs. In contrast, Aroclor 1260 is present at 54,000 ug/kg at sample location PCB 9-2, which exceeds the WRW AL of 12,400 ug/kg. However, this is the contamination in the storm drain sump at IHSS Group 400-3 (Contaminant Release Area #6). As previously discussed, this storm drain and its contents will be removed during D&D of the Building 440 complex.

Application of the Subsurface Soil Risk Screen

As shown in Table 6 and Figures 6a through 6d, metals, radionuclides and occasionally VOCs, SVOCs, and PCBs are above background in subsurface soil. The subsurface soil risk screen (RFCA Attachement 5) has been applied to these data.

Screen 1 – Are Contaminant of Concern (COC) Concentrations Below Table 3 Wildlife Refuge Worker (WRW) Soil Action Levels?

No. Arsenic at CJ48-004 (Figure 6a), arsenic at CP45-000 (Figure 6c), and chromium at 41896 (Figure 4d) are at concentrations above their WRW ALs. Concentrations are all within a factor of 2 of the WRW ALs.

Screen 2 – Is there potential for subsurface soil to become surface soil?

No. The locations where arsenic and chromium exceed the WRW ALs are not in areas prone to landslides as shown in Figure 1 of RFCA Attachment 5.

Screen 3 – Does subsurface soil radiological contamination exceed criteria in Section 5.3 and Attachment 14?

No. Concentrations of radionuclides are not above WRW ALs.

Screen 4 – Is there an environmental pathway and sufficient quantity of COC that would cause exceedance of surface water standards (SWS)?

No. Contaminant migration via erosion and groundwater are the two possible pathways whereby surface water could become contaminated from PAC 000-505 releases.

Erosion

The specific contaminant release areas have been remediated through accelerated action, otherwise determined to be NFAA, or will be dispositioned through D&D actions. The contamination outside of these specific contaminant release areas is at relatively low levels. The data do not suggest the storm sewers are a source of contamination, but rather, reflect deposition of contaminants from other sources within the IA resulting from runoff entering the drains. Contamination in runoff is potentially increased by soil disturbance activities from within the IA, in particular D&D activities. However, pursuant to the RFETS Storm Water Pollution Prevention Plan, the Site uses erosion control measures to protect watershed resources and water quality. Temporary sediment control practices implemented at the Site include linear sediment barriers (such as silt fencing, sandbag barriers, or straw bale barriers), and providing fiber rolls (wattles), gravel bag berms, or check dams to break up slope length or flow. For long-term sediment control, the Site uses soil stabilization measures to reduce sediment transport from exposed soil surfaces. Areas of soil that are left exposed after demolition are graded and then revegetated with native grasses in accordance with the RFETS Revegetation

Plan (K-H 2004). A hydromulch is then applied to the seeded soil to temporarily prevent soil movement before a vegetative cover can be established. Straw-coconut mats are also applied on slopes to reduce erosion. The rugged coconut fiber increases longevity of the product, but the product is designed to photo- and bio-degrade over time.

Many storm drains will be removed as part of the IA land re-configuration. Others will be capped or plugged and remain in place. Earthwork will be required where storm drains are removed to either fill in disturbed areas to achieve existing grade or to grade the area and establish a functional channel (DOE 2004i). During removal of the storm drains, erosion control measures will be utilized to protect water quality. Those areas that as a result of grade, soil type, proximity to waterways, or recognized presence of radiological or hazardous substances, offer the greatest potential for soil loss and downgradient water quality impacts, and will be afforded special erosion control considerations. The Environmental Assessment for Pond and Land Configuration indicates a Finding of No Significant Impact from the configuration activities, including the removal of storm drains (DOE 2004j).

Groundwater

Groundwater throughout most of the IA is contaminated, primarily with VOCs. The low level contamination in subsurface soil near the storm drains does not suggest that the drains are a source for groundwater contamination. The need for and extent of any groundwater remediation in the IA is being addressed by the Groundwater Interim Measure/Interim Remedial Action (IM/IRA).

Action/No Further Accelerated Action Recommendation

PAC 000-505 is proposed for NFAA. There are eight specific contaminant-release areas cited in the description of PAC 000-505. These areas have been or will be characterized/remediated through the IASAP, ER RSOP, or D&D activities. Sediment and surface soil analyte concentrations elsewhere along the storm drain network are at concentrations well below the WRW ALs. The SSRS does not indicate that contaminated subsurface soil should be removed for the protection of human health and water quality. As part of the final pond and land configuration, most storm drains will be removed, a few will be retained and plugged, and even fewer will be retained and remain operational (DOE 2004i). The proposed storm drain disposition is shown on Figure 7. The storm drain disposition has been approved by the regulatory agencies. Erosion control measures will be applied as appropriate during these activities. Ecological effects will be evaluated in the Accelerated Action Ecological Screening Evaluation and the ecological portion of the Sitewide Comprehensive Risk Assessment.

References

CDPHE, 2003a. Data Summary Report for IHSS Group 400-3 Approval Letter, December 18.

CDPHE, 2004a, Correspondence to J. Legare, DOE RFO; from S. Gunderson; CDPHE, RE: No Further Accelerated Action NFAA Request for IHSS 143 (B771) - Approval, September 7.

CDPHE, 2004b, Correspondence to J. Legare, DOE RFO; from S. Gunderson; CDPHE, RE: Closeout Report for IHSS Group 900-1 (B991 & 993) - Approval, March 31.

CDPHE, 2004c, Correspondence to J. Legare, DOE RFO; from S. Gunderson; CDPHE, Approval, Data Summary Report for IHSS Group 400-4, PAC 400-803 – Miscellaneous Dumping, Building 446 Storm Drain, and PAC -804 – Road North of Building 460, August 23.

CDPHE, 2004d, Correspondence to J. Legare, DOE RFO; from S. Gunderson; CDPHE, RE: No Further Accelerated Action Justification PCB Potential Areas of Concern (April 15, 2004), May 6.

CDPHE, 2004e, Correspondence to J. Legare, DOE RFO; from S. Gunderson; CDPHE, RE: Approval, Draft, Environmental Restoration, RFCA Standard Operating Protocol for Routine Soil Remediation, FY04 Notification #04-10, IHSS Group 700-11, July 9.

DOE, 1992, Historical Release Report for the Rocky Flats Plant, Rocky Flats Plant, Golden, Colorado, June.

DOE, 1993, Background Geochemical Characterization Report, Golden, CO, September.

DOE, 1995, Geochemical Characterization of Background Surface Soils: Background Soils Characterization Program, Golden, Colorado, May.

DOE, 1997, Closeout Report for the Source Removal of PCBs, RF/RMRS-97-044, Revision 0, July.

DOE, 1998, Decommissioning Program Plan, Rocky Flats Environmental Technology Site, October 8.

DOE, 1999a, Annual Update for the Historical Release Report, RF/RMRS-99-428.UN, Rocky Flats Environmental Technology Site, Golden, CO, September, 1999.

DOE, 1999b, 776/777 Closure Project Decommissioning Operations Plan, Rocky Flats Environmental Technology Site, Golden, Colorado, November.

DOE, 2001, Industrial Area Sampling and Analysis Plan, Rocky Flats Environmental Technology Site, June.

DOE, 2002, Buffer Sampling and Analysis Plan Addendum #BZ-02-01, Rocky Flats Environmental Technology Site, Golden, Colorado, April.

DOE, 2003a, Environmental Restoration, RFCA Standard Operating Protocol for Routine Soil Remediation, Rocky Flats Environmental Technology Site, September.

DOE, 2003b, Industrial Area Sampling and Analysis Plan Addendum #IA-03-03, Rocky Flats Environmental Technology Site, Golden, Colorado, February.

DOE, 2003c, Industrial Area Sampling and Analysis Plan Addendum #IA-03-14, Rocky Flats Environmental Technology Site, Golden, Colorado, August.

DOE, 2003d, Industrial Area Sampling and Analysis Plan Addendum #IA-03-06, Rocky Flats Environmental Technology Site, Golden, Colorado, May.

DOE, 2003e, Data Summary Report for IHSS Group 400-3, Rocky Flats Environmental Technology Site, December.

DOE, 2003f, Industrial Area Sampling and Analysis Plan Addendum #IA-03-04, Rocky Flats Environmental Technology Site, Golden, Colorado, May.

DOE, 2003g, Environmental Restoration, RFCA Standard Operating Protocol for Routine Soil Remediation, FY03 Notification #03-14, IHSS Group 000-2, October.

DOE, 2004a, No Further Accelerated Action Justification for 771 Outlfall, PAC Reference Number 700-143, August.

DOE, 2004b, Closeout Report IHSS Group 900-1, Rocky Flats Environmental Technology Site, April.

DOE, 2004c, Industrial Area Sampling and Analysis Plan Fiscal Year 2004 Addendum #IA-04-14, IHSS Group 400-4, Rocky Flats Environmental Technology Site, Golden, Colorado.

DOE, 2004d, Data Summary Report for IHSS Group 400-4, PAC 400-803 – Miscellaneous Dumping, Building 446 Storm Drain, and PAC -804 – Road North of Building 460, August.

DOE 2004e, RSOP for Facility Disposition Notification Letter for Building 447, Rocky Flats Environmental Technology Site, September 23.

DOE, 2004f, RFCA Standard Operating Protocol (RSOP) for Facility Disposition, rev 1, Rocky Flats Environmental Technology Site, March.

DOE, 2004g, Environmental Restoration, RFCA Standard Operating Protocol for Routine Soil Remediation, FY04 Notification #04-04, IHSS Group 700-3, July.

DOE, 2004h, Closeout Report for IHSS Group 400-8, Rocky Flats Environmental Technology Site, March.

DOE, 2004i, Environmental Restoration, RFCA Standard Operating Protocol for Routine Soil Remediation, FY04 Notification #04-10, IHSS Group 700-11 (Bowman's Pond and Steam Condensate Tanks, July.

DOE, 2004j, Draft Final Environmental Assessment, Pond and Land Configuration, Rocky Flats Environmental Technology Site, September.

DOE, CDPHE, EPA, 2003, Modifications to the Rocky Flats Cleanup Agreement Attachment 5, U.S. Department of Energy, Colorado Department of Public Health and Environment, and U.S. Environmental Protection Agency, Rocky Flats Environmental Technology Site, Golden, Colorado, June.

K-H, 2004, Rocky Flats Environmental Technology Site Revegetation Plan, Rev. 2, Kaiser-Hill Company, L.L.C., Rocky Flats Environmental Technology Site, Golden, CO, January.

Table 3 PAC 000-505 Analytical Summary

	Surface Soil		yucai Sumii	Sediment	- 44 - 4		Subsu	rface Soil		
Location Code	Collection Date	Analyte Group	Location Code	Collection Date	Analyte Group	Location Code	Collection Date	Start Depth	End Depth	Analyte Group
3495	2/27/1995	Metal	CN41-000	6/3/2003	Metal	1495	3/7/1995	2	6	Metal
3495	2/27/1995	Rads	CN41-000	6/3/2003	Rads	1495	3/7/1995	2	6	PCB
3495	2/27/1995	svoc	PCB-31-13	5/9/1991	РСВ	1495	3/7/1995	2	6	Pesticide
3495	2/27/1995	VOC	PCB-31-16	5/9/1991	PCB	1495	3/7/1995	2	6	Rads
BW36- 031	1/20/2004	Metal	SED0010101	1/23/2001	Metal	1495	3/7/1995	. 2	6	svoc
BW36- 031	1/20/2004	Rads	SED0010101	1/23/2001	Rads	1495	3/7/1995	2	6	voc
BW36- 033	1/21/2004	Metal _	SED0010101	1/23/2001	VOC	1495	3/7/1995	8	15	Metal
BW36- 033 BW42-	1/21/2004	Rads	SED0020101	1/23/2001	Metal	1495	3/7/1995	8	15	Rads
005 BW42-	9/5/2002	Metal	SED0020101	1/23/2001	Rads	1595	3/2/1995	2	5	Metal
005	9/5/2002	Rads	SED0020101	1/23/2001	VOC	1595	3/2/1995	2	5	PCB
BY45-006	2/20/2003	Metal	SED0030400	6/20/2000	Rads	1595	3/2/1995	2	5	Pesticide
BY45-006	2/20/2003	Rads	SED0050400	6/20/2000	· Rads	1595	3/2/1995	2	5	Rads
BY45-006	2/20/2003	svoc	SED0070400	6/20/2000	Rads	1595	3/2/1995	2	5	SVOC
BY45-006	2/20/2003	VOC	SED0140400	6/20/2000	Rads	1595	3/2/1995	2	5	VOC .
BZ42-003	8/13/2002	Metal	SED06995	3/3/1995	Metal	1595	3/3/1995	12	13	VOC ·
BZ42-003	8/13/2002	PCB	SED06995	3/3/1995	PCB	1695	3/2/1995	2	4	Metal
BZ42-003	8/13/2002	Rads	SED06995	3/3/1995	Pesticide	1695	3/2/1995	2	4	PCB
BZ42-003	8/13/2002	svoc	SED06995	3/3/1995	Rads	1695	3/2/1995	2	4	Pesticide
BZ42-003	8/13/2002	VOC	SED06995	3/3/1995	svoc	1695	3/2/1995	2	4	Rads .
CE46-017	4/28/2004	Rads	SED06995	3/3/1995	VOC	1695	3/2/1995	2	4	svoc
CE48-023	2/13/2003_	Rads	SED06995	3/3/1995	WQP	1695	3/2/1995	2	4	VOC
CF44-004	7/8/2004	Rads	SED117	11/28/1990	Metal	2491	11/6/1991	11.9	12.1	voc
CG47-013	4/19/2004	Metal	SED117	11/28/1990	PCB	3495	3/23/1995	2.4	6	Metal
CG47-013	4/19/2004	Rads	SED117	11/28/1990	Pesticide	3495	3/23/1995	2.4	6	SVOC
CG47-013	4/19/2004	svoc	SED117	11/28/1990	Rads	3495	3/23/1995	2.4	6	VOC
CG47-013	4/19/2004	VOC	SED117	11/28/1990	svoc	3495	3/23/1995	6	-8	Metal
CG47-016	4/20/2004	Metal	SED117	11/28/1990	VOC	3495	3/23/1995	6	8	svoc
CG47-016	4/20/2004	Rads	SED117	11/28/1990	WQP	3495	3/23/1995	6	8	VOC
CG47-016	4/20/2004	SVOC	SED117	3/27/1991	Metal	3495	3/23/1995	8	10	Metal
CG47-016	4/20/2004	VOC	SED117	3/27/1991	PCB	3495	3/23/1995	8	10	VOC
· CG48-029	6/8/2004	PCB	SED117	3/27/1991	Pesticide	14395	5/19/1995	4	6	Metal
CH49-004	1/21/2003	Metal	SED117	3/27/1991	Rads	14395	5/19/1995	4	- 6	PCB
CH49-004	1/21/2003	PCB	SED117	3/27/1991	svoc	14395	5/19/1995	4	6	Pesticide
CH49-004	1/21/2003	Rads	SED117	3/27/1991	voc	14395	5/19/1995	4	6	Rads
CH49-004	1/21/2003	SVOC	SED117	5/14/1991	Metal	14395	5/19/1995	4	6	svoc
CH49-004	1/21/2003	VOC	SED117	5/14/1991	PCB	14395	5/19/1995	4	6	voc
CI45-014	1/7/2004	Metal	SED117	5/14/1991	Pesticide	14395	5/19/1995	15.7	16	VOC
CI45-014	1/7/2004	Rads	SED117	5/14/1991	Rads	41898	5/18/1998	0	6	Metal
CJ45-017	1/8/2004	Metal	SED117	5/14/1991	svoc	41898	5/18/1998	0	6	Rads
CJ45-017	1/8/2004	Rads	SED117	5/14/1991	voc	41898	5/18/1998	0	6	voc

Til Talles	Surface Soil			Sediment		4.38323	Subsur	rface Soil		
Location	Collection	Analyte	Location	Collection	Analyte	Location	Collection	Start	End	Analyte
Code	Date	Group	Code	Date	Group ::	Code BV38-	Date	Depth *	Depth	Group
CP40-001	6/26/2002	Metal	SED117	8/13/1991	Metal	004 BV38-	12/19/2003	12.5	15.5	Metal
CP40-001_	6/26/2002	PCB	SED117	8/13/1991	PCB	004	12/19/2003	12.5	15.5	svoc
CP40-001	6/26/2002	Pesticide	SED117	8/13/1991	Pesticide_	BV38- 004	12/19/2003	12.5	15.5	voc
CP40-001	6/26/2002	Rads	SED117	8/13/1991	Rads	BV38- 004	12/19/2003	12.5	15.5	WQP
CP40-001	6/26/2002	svoc	SED117	8/13/1991	svoc	BV38- 013	12/19/2003	2.5	4.5	Metal
CP40-001	6/26/2002	VOC	SED117	8/13/1991	voc	BV38- 013	12/19/2003	2.5	4.5	Rads
						BV38- 013	12/19/2003	2.5	4.5	svoc
CQ40-000	5/22/2002	Metal	SED117	12/4/1991	Metal	BV38-				
CQ40-000	5/22/2002	PCB	SED117	12/4/1991	PCB	013 BW36-	12/19/2003	2.5	4.5	VOC
CQ40-000	5/22/2002	Pesticide	SED117	12/4/1991	Pesticide	009 BW36-	7/17/2003	1.3	3.3	Metal
CQ40-000	5/22/2002	svoc	SED117	12/4/1991	/4/1991 Rads		7/17/2003	1.3	3.3	Rads
CQ40-000	5/22/2002	voc	SED117	12/4/1991	svoc	BW36- 009 BW36-	7/17/2003	1.3	3.3	VOC
PCB-31-5	5/9/1991	РСВ	SED117	12/4/1991	voc	033	1/21/2004	0.5	2.5	Metal
PCB-9-2	6/28/1991	PCB	SED117	2/27/1992	Metal	BW36- 033	1/21/2004	0.5	2.5	Rads
PCB-9-2	6/28/1991	Rads	SED117	2/27/1992	PCB	BW36- 033	1/21/2004	0.5	2.5	voc
SS014093	7/27/1994	Metal	SED117	2/27/1992	Pesticide	BW36- 039	1/21/2004	0.5	2.5	Metal
SS014093	7/27/1994	WOP	SED117	2/27/1992	Rads	BW36- 039	1/21/2004	0.5	2.5	Rads
	6/8/1994	Metal	SED117	2/27/1992	SVOC	BW36- 039	1/21/2004	0.5	2.5	voc
SS302093					voc	BW38- 001	5/19/2003	2.5	4.5	Metal
SS302093	6/8/1994	Rads	SED117	2/27/1992		BW38-				
SS402393	12/30/1992	Metal	SED118	9/18/1990	Metal	001 BW38-	5/19/2003	2.5	4.5	PCB
SS402393	12/30/1992	PCB	SED118	9/18/1990	PCB	001 BW38-	5/19/2003	2.5	4.5	Rads
SS402393	12/30/1992	Pesticide	SED118	9/18/1990	Pesticide	001 BW38-	5/19/2003	2.5	4.5	SVOC
SS402393	12/30/1992	Rads	SED118	9/18/1990	Rads	001 BW38-	5/19/2003	2.5	4.5	VOC
SS402393	12/30/1992	svoc	SED118	9/18/1990	svoc	001	5/19/2003	4.5	6.5	Metal
SS402393	12/30/1992	· voc	SED118	9/18/1990	voc	BW38- 001	5/19/2003	4.5	6.5	РСВ
SS403493	5/17/1993	Metal	SED118	11/28/1990	Metal	BW38- 001	5/19/2003	4.5	6.5	Rads
SS403493	5/17/1993	РСВ	SED118	11/28/1990	РСВ	BW38- 001	5/19/2003	4.5	6.5	svoc
			SED118	11/28/1990	Pesticide	BW38- 001	5/19/2003	4.5	6.5	voc
SS403493	5/17/1993	Pesticide				BW38-	5/19/2003	4.5	6.5	WQP
SS403493_	5/17/1993	Rads	SED118	11/28/1990	Rads	001 BW38-				
SS403493	5/17/1993	SVOC	SED118	11/28/1990	SVOC	001 BW38-	5/19/2003	6.5	8.5	Metal
SS403493	5/17/1993	VOC	SED118	11/28/1990	VOC	001 BW38-	5/19/2003	6.5	8.5	PCB
SS431094	11/14/1994	Metal	SED118	11/28/1990	WQP	001 BW38-	5/19/2003	6.5	8.5	Rads
SS431094	11/14/1994	Rads	SED118	3/27/1991	Metal	001	5/19/2003	6.5	8.5	svoc

	Surface Soil			Sediment	. 6. 2 S . 2 Gs.		Subsu	rface Soil	ATTENDED AND	21.25
Location	Collection	Analyte .	Location	Collection	Analyte	Location	Collection	Start	End	Analyte
Code	Date	Group	Code	Date	Group	Code BW38-	Date:	Depth	Depth	Group
SS431094	11/14/1994	svoc	SED118	3/27/1991	PCB	001	5/19/2003	6.5	8.5	voc
SS431094	11/14/1994	VOC_	SED118	3/27/1991	Pesticide	BW38- 001	5/19/2003	6.5	8.5	WQP
SS432694	11/14/1994	Metal	SED118	3/27/1991	Rads	BX38- 007	7/30/2003	3.5	4	Metal
SS432694	11/14/1994	Rads	SED118	3/27/1991	svoc	BX38- 007	7/30/2003	3.5	4	Rads
SS432694	11/14/1994	SVOC	SED118	3/27/1991	voc	BX38- 007	7/30/2003	3.5	4	svoc
SS432694	11/14/1994	. voc	SED118	5/21/1991	Metal	BX38- 007	7/30/2003	3.5	4	voc
SS460294	10/25/1994	Rads	. SED118	5/21/1991	РСВ	CB42- 001	2/27/2004	4.8	6.8	VOC
SS609992	10/7/1992	Metal	SED118	5/21/1991	Pesticide	CB42- 001	2/27/2004	6.8	8.8	VOC
SS609992	10/7/1992	PCB	SED118	5/21/1991	Rads	CB42- 001	2/27/2004	8.8	10.8	VOC
SS609992	10/7/1992	Pesticide	SED118	5/21/1991	svoc	CB42- 014	5/13/2004	2.5	4.5	voc
SS609992	10/7/1992	Rads	SED118	5/21/1991	voc	CB42- 014	5/13/2004	4.5	6.5	VOC
SS611292	10/8/1992	Metal	SED118	8/13/1991	Metal	CC42- 004	5/18/2004	2.5	4.5	VOC
SS611292	10/8/1992	PCB	SED118	8/13/1991	PCB	CC42- 004	5/18/2004	4.5	6.5	VOC
SS611292	10/8/1992	Pesticide	SED118	8/13/1991	Pesticide	CC42- 009	5/18/2004	2.5	4.5	voc
	10/8/1992	Rads	SED118	8/13/1991	Rads	CC42- 009	5/18/2004	4.5	6.5	VOC
SS611292 SS611292	10/8/1992	WOP	SED118	8/13/1991	SVOC	CC43- 018	11/18/2003	2.5	4.5	Metal
		Metal "	SEDI18	8/13/1991	VOC	CC43- 018	11/18/2003	2.5	4.5	РСВ
SS613392	9/29/1992		SED118	12/4/1991	Metal	CC43- 018	11/18/2003	2.5	4.5	Rads
SS613392	9/29/1992	PCB_		,	PCB	CC43- 018	11/18/2003	2.5	4.5	VOC
SS613392	9/29/1992	Pesticide	SED118	12/4/1991		CC43- 018	11/18/2003	4.5	6.5	Metal
SS613392	9/29/1992	WQP	SED118	12/4/1991	Pesticide	CC43- 018		4.5	6.5	PCB
SS800993	12/1/1994	Metal	SED118	12/4/1991	Rads	CC43-	11/18/2003	4.5	6.5	Rads
SS800993	12/1/1994	Rads	SED118	12/4/1991	SVOC	018 CC43-				VOC
SS800993	12/1/1994	SVOC	SED118	12/4/1991	VOC	018 CC43-	11/18/2003	4.5	6.5	
SS800993	12/1/1994	VOC	SED118	2/27/1992	Metal	022 CC43-	11/18/2003	2.5	4.5	Metal
SS800993	12/1/1994	WQP	SED118	2/27/1992	PCB	022 CC43-	11/18/2003	2.5	4.5	PCB
SS801693	10/27/1994	Metal	SED118	2/27/1992	Pesticide	022 CC43-	11/18/2003	2.5	4.5	Rads
SS801693	10/27/1994	Rads	SED118	2/27/1992	Rads	022 CC43-	11/18/2003	2.5	4.5	VOC
SS801693	10/27/1994	svoc	SED118	2/27/1992	svoc	022 CC43-	11/18/2003	4.5	6.5	Metai
SS801693	10/27/1994	VOC	SED118	2/27/1992	voc	022 CC43-	11/18/2003	4.5	6.5	PCB
			SED20193	5/31/1994	Metal	022 CC43-	11/18/2003	4.5	6.5	Rads
•			SED20193	5/31/1994	PCB	022 CE44-	11/18/2003	4.5	6.5	voc
			SED20193	5/31/1994	Rads	002	7/6/2004	0.5	2.5	PCB

Surface Soil	Area and	Sediment	(1) (1) (1) (1) (1) (1) (1) (1) (1) (1)		Subsui	face Soil		
Location Collection Analyte	Location	Collection	Analyte	Location	Collection	Start	End	-Analyte
Code Date Group	Code	Date	Group	CE44-	Date:	Depth	Depth	Group
	SED20193	5/31/1994	VOC	002	7/6/2004	0.5	2.5	Rads
	SED20293	5/31/1994	Metal	CE44- 002	7/6/2004	0.5	2.5	voc
			РСВ	CE45- 000	6/22/2004	0.5	2.5	РСВ
·	SED20293	5/31/1994	РСВ	CE45-				
,	SED20293	5/31/1994	Rads	000 CE45-	6/22/2004	0.5	2.5	Rads
	SED20793	4/7/1994	Metal	000 CE45-	6/22/2004	0.5	2.5	VOC
	SED20793	4/7/1994	PCB	006	7/12/2004	0.5	2.5	PCB
	SED20793	4/7/1994	Pesticide	CE45- 006	7/12/2004	0.5	2.5	Rads
	SED20793	4/7/1994	Rads	CE45- 006	7/12/2004	0.5	2.5	VOC
				CE45-	,	0.5	2.5	РСВ
,	SED20793	4/7/1994	VOC	008 CE45-	6/30/2004			
	SED21293	4/11/1994	Metal	008 CE45-	6/30/2004	0.5	2.5	Rads
	SED21293	4/11/1994	PCB	008	6/30/2004	0.5	2.5	VOC
	SED21293	4/11/1994	Pesticide	CF41- 000	7/22/2004	2.5	4.5	VOC
	SED21293	4/11/1994	Rads	CF41- 004	7/21/2004	2.5	4.5	VOC
			VOC	CF41- 005	7/21/2004	2.5	4.5	VOC
	SED21293	4/11/1994	<u> </u>	CG44-				
	SED21593	4/5/1994	Metal	009 CG44-	4/22/2004	2.5	4.5	Metal
	SED21593	4/5/1994	PCB	009 CG44-	4/22/2004	2.5	. 4.5	Rads
	SED21593	4/5/1994	Pesticide	009	4/22/2004	2.5	4.5	svoc
	SED21593	4/5/1994	Rads	CG44- 009	4/22/2004	2.5	4.5	VOC
	SED21593	4/5/1994	VOC	CG44- 009	4/22/2004	4.5	6.5	Metal
				CG44-			6.5	
	SED42800	10/11/2000	Rads	009 CG44-	4/22/2004	4.5		Rads
	SED65992	2/17/1993	Metal	009 CG44-	4/22/2004	4.5	6.5	SVOC
	SED65992	2/17/1993	РСВ	009	4/22/2004	4.5	6.5	VOC
	SED65992	2/17/1993	Pesticide	CG47- 036	1/27/2004	3.5	4	Metal
	SED65992	2/17/1993	Rads	CG47- 036	1/27/2004	3.5	4	Rads
			svoc	CG47- 036	1/27/2004	3.5	4	VOC
	SED65992	2/17/1993		CH47-				
	SED65992	2/17/1993	VOC	000 CH47-	9/22/2003	3	4.5	Metal
	SED65992	2/17/1993	WQP	000 CH47-	9/22/2003	3	4.5	Rads
	SED69692	5/10/1993	Metal	000	9/22/2003	3	4.5	VOC
	SED69692	5/10/1993	РСВ	CH47- 000	9/22/2003	5	6.5	Metal
	SED69692	5/10/1993	Pesticide	CH47- 000	9/22/2003	5	6.5	Rads
				CH47-				
	SED69692	5/10/1993	Rads	000 CH47-	9/22/2003	5	6.5	VOC
	SED69692	5/10/1993	svoc	000	9/22/2003	7	8.5	Metal

Surface Soil		Sediment	CAP NEW YO	经的满刻	Subsu	rface Soil		Neger .
Location Collection Analyte	Location	Collection	Analyte	Location	Collection	Start	End	Analyte
Code : Date Group	Code	Date	*Group	Code CH47-	Date 5	Depth	Depth.	Group
[SED69692	5/10/1993	VOC	000	9/22/2003	7 .	8.5	Rads
	SED69892	5/10/1993	Metal	CH47- 000	9/22/2003	7	8.5	voc
	SED69892	5/10/1993	РСВ	CH48- 000	8/26/2002	4.5	6.5	Metal
				CH48-				
·	SED69892	5/10/1993	Pesticide	000 CH48-	8/26/2002	4.5	6.5	Rads
	SED69892	5/10/1993	Rads	000 CH48-	8/26/2002	4.5	6.5	WQP
	SED69892	5/10/1993	SVOC	003 CH48-	2/25/2003	4.5	6.5	Metal
	SED69892	5/10/1993	voc	003	2/25/2003	4.5	6.5	Rads
	SED750501	1/25/2001	Metal	CH48- 003	2/25/2003	4.5	6.5	WQP
	SED750501	1/25/2001	Rads	CH48- 016	8/26/2002	4.5	6.5	Metal
	SED750501	1/25/2001	voc	CH48-	8/26/2002	4.5	6.5	Rads
	SED80093	12/12/1994	Metal	CH48- 016	8/26/2002	4.5	_ 6.5	WQP
	SED80093	12/12/1994	Rads	CH48- 020	1/23/2003	4.5	6.5	Metal
	SED80093	12/12/1994	svoc	CH48- 020	1/23/2003	4.5	6.5	Rads
	SED80093	12/12/1994	VOC	CH48- 020	. 1/23/2003	4.5	6:5	WOP
			1	CH48-				
	SED80193	12/12/1994	Metal	021 CH48-	1/23/2003	4.5	6.5	Metal
	SED80193	12/12/1994	Rads	021 CH48-	1/23/2003	4.5	6.5	Rads
	SED80193	12/12/1994	SVOC	021 CH48-	1/23/2003	4.5	6.5	WQP
·	SED80193	12/12/1994	voc	051	12/29/2003	2.5	4.5	Rads
	SS401793	12/31/1992	Metal	CI46- 037	12/31/2003	2.5	3	Rads
	SS401793	12/31/1992	РСВ	CI46- 038	12/31/2003	2.5	3	Rads
	SS401793	12/31/1992	Pesticide_	CI48- 039	12/23/2003	3.5	. 4	Rads
	SS401793	12/31/1992	Rads	CJ45- 010	2/23/2004	2.5	4.5	Metal
	SS401793	12/31/1992	SVOC	CJ45- 010	2/23/2004	2.5	4.5	Rads
·				CJ45-				
	SS401793	12/31/1992	VOC	010 CJ45-	2/23/2004	2.5	4.5	VOC
<u> </u>	SS441494	9/7/1994	Metal	010 CJ45-	2/23/2004	4.5	6.5	Metal
[SS441494	9/7/1994	Rads	010 CJ45-	2/23/2004	4.5	6.5	Rads
•				010 CJ46-	2/23/2004	4.5	6.5	voc
				011	2/23/2004	2.5	4.5	Metal
			ļ	CJ46- 011	2/23/2004	2.5	4.5	Rads
				CJ46- 011	2/23/2004	2.5	4.5	VOC
				CJ46- 011	2/23/2004	4.5	6.5	Metal
				CJ46- 011	2/23/2004	4.5	6.5	Rads
ı	,					7.2	0,0	-1403

Surface Soil		Sediment		Subsu	rface Soil	MOSS	247148
Location Collection Analyte	th Location Code	Collection Analyte	Location	Collection Date	Start Depth	End Depth	Analyte. Group
Code Date Group	Code -	Date Group	CJ46-	Date 8.53	#Depuis	@Depuis	2 Group %
			011	2/23/2004	4.5	6.5	VOC
		. •	CJ46- 018	1/12/2004	2.5	4.5	Metal
<u>.</u>			CJ46-	17122004		7.5	Wictai
•			018	1/12/2004	2.5	4.5	Rads
			CJ46- 018	1/12/2004	2.5	4.5	voc
			CJ46-				
			018 CJ46-	1/12/2004	4.5	6.5	Metal
	•		018	1/12/2004	4.5	6.5	Rads
			CJ46-	141040004	4.5	(5	Voc
	•		018 CJ46-	1/12/2004	4.5	6.5	VOC
,			018	1/12/2004	6.5	8.5	Metal
			CJ46- 018	1/12/2004	6.5	8.5	Rads
			CJ46-				
			018	1/12/2004	6.5	8.5	VOC
			CJ46- 018	1/12/2004	8.5	10.5	Metal
			CJ46-				
			018 CJ46-	1/12/2004	8.5	10.5	Rads
			018	1/12/2004	8.5	10.5	VOC
₹ .			CJ46- 021	1/13/2004	2.5	4.5	Metal
·			CJ46-	1/13/2004	2.3	. 4.5	IVICIAI
	•		021	1/13/2004	2.5	4.5	Rads
· ·		:	CJ46- 021	1/13/2004	2.5	4.5	voc
•			CJ46-				
?		,	021 CJ46-	1/13/2004	4.5	• 6.5	Metal
			021	1/13/2004	4.5	6.5	Rads
5 g		•	CJ46-	1/12/2004	4.5	6.5	voc
			021 CJ46-	1/13/2004	4.5	6.5	VOC
			021	1/13/2004	6.5	8.5	Metal
	-		CJ46- 021	1/13/2004	6.5	8.5	Rads
	•		CJ46-				
			021 CJ46-	1/13/2004	6.5	8.5	VOC
			021	1/13/2004	8.5	10.5	Metal
			CJ46-				
			021 CJ46-	1/13/2004	8.5	10.5	Rads
			021	1/13/2004	8.5	10.5	VOC
			CJ48- 004	8/26/2002	0	6	Metal
			CJ48-				
			004	8/26/2002	0	6	Rads
			CJ48- 041	12/23/2003	2.5	. 3	Rads
			CM43-				
			000 CM43-	5/29/2003	2.5	4.5	Metal
			000	5/29/2003	2.5	4.5	Rads
			CM43-		2.5	45	VOC
			000 CO43-	5/29/2003	2.5	4.5	VOC
			001	4/2/2003	2.5	4.5	Metal

Surface Soil		Subsu	rface Soil		
Location Collection Analyte Location Collection Analyte	Location	Collection	Start	End	Analyte
Code Date Group Code Date Group	Code CO43-	Date	Depth	Depth	Group
•	001	4/2/2003	2.5	4.5	Rads
	CO43- 001	4/2/2003	2.5	4.5	voc
	CP40-				
	001 CP40-	6/26/2002	2.5	4.5	Metal
	001	6/26/2002	2.5	4.5	PCB
	CP40- 001	6/26/2002	2.5	4.5	Pesticide
,	CP40- 001	6/26/2002	2.5	4.5	Rads
	CP40-				
	001 CP40-	6/26/2002	2.5	4.5	SVOC
	001	6/26/2002	2.5	4.5	_ voc
	CP40- 001	6/26/2002	4.5	6.5	Metal
·	CP40- 001	6/26/2002	4.5	6:5	РСВ
	CP40-				
	001 CP40-	6/26/2002	4.5	6.5	Pesticide
	001	6/26/2002	4.5	6.5	Rads
	CP40- 001	6/26/2002	4.5	6.5	svoc
	CP40- 001	6/26/2002	4.5	6.5	voc
	CP45-				
	-000 CP45-	10/22/2002	0	5	Metal
	000	10/22/2002	0_	5	Rads
·	CP45- 000	10/22/2002	0	5_	voc
	CP45- 000	11/18/2002	5	9	Metal
	CP45-				
	000 CP45-	11/18/2002	5	9、_	Rads
	000	11/18/2002	9.5	10	voc
·	CP45- 000	11/18/2002	10	14.5	Metal
·	CP45- 000	11/18/2002	10	14.5	Rads
	CQ41-				
	004 CQ41-	8/20/2002	2.5	4.5	PCB
	004	8/20/2002	2.5	4.5	VOC
	CQ41- 004	8/20/2002	4.5	6.5	РСВ
	CQ41-	8/20/2002	4.5	6.5	voc
·	004 CQ41-	T			
	004 CR44-	8/20/2002	6.5	8.5	PCB
	000_	9/8/2003	8.5	10.5	Metal
	CR44- 000	9/8/2003	8.5	10.5	Rads
	CR44-				VOC
	000	9/8/2003	8.5	10.5	VOC

Table 4 Summary of Constituents Above Background in Sediment

Analyte 💝	mary of Constituer	Total	Number	Number	Average	Maximum	» ⟨BG⟩	& Wildlife, &	Unit
Group		Number	of	of	Conc.	Conc.	Mean	Refuge	
		Samples Analyzed	Samples above	Samples above			Plus 2SD	Worker AL	
		2.0	BG but	the AL	1. 整整多年 1. 建安克品化。				
		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	below the AL			\$ \$ 5 mg	8 8 C S On 18 8	* 1 × 1 × 8 * 1 * 1	Adami Kinggi Hadi Kabupat
Metal	Aluminum	31	4	0 .	18925	23700	15713	228000	mg/kg
Metal	Antimony	30	. 3	0	17.8	26.3	13.01	409	mg/kg
Metal	Arsenic	31	4	. 0	9.425	10.7	7.24	22.2	mg/kg
Metal	Barium	31	1	0	805	805	188	26400	mg/kg
Metal	Cadmium	31	2	0	1.95`	2	1.88	962	mg/kg
Metal	Chromium	32	2	0	33.95	36.2	23.23	268	mg/kg
Metal	Cobalt	31	2	0	14.8	15	12.3	1550	mg/kg
Metal	Copper	31	4	0	71.7	167	27.27	40900	mg/kg
Metal	lron	31	5 .	0	25840	36900	21379	307000	mg/kg
Metal	Lead	31	1	0	131	131	95.6	1000	mg/kg
Metal	Mercury	28	1	0	0.5	0.5	0.34	25200	mg/kg
Metal	Nickel	31	6	0	24.0	38.9	17.89	20400	mg/kg
Metal	Silver	31	2	. 0	. 2.3	2.3	2.28	5110	mg/kg
Metal	Vanadium	31	. 1	0	142	142	46.83	7150	mg/kg
Metal	Zinc	31	13	0	267	728	104.4	307000	mg/kg
PCB	Aroclor-1254	29	5	0	6780	11900		12400	ug/kg
Radionuclide	Americium-241	30	5	0	0.965	1.39	0.27	76	pCi/g
Radionuclide	Plutonium-239/240	34	2	0.	2	2	1.35	50	pCi/g
Radionuclide	Uranium-234	28	1	0	4.13	4.13	3.98	300	pCi/g
Radionuclide	Uranium-235	28	3	0	0.206	0.210	0.15	8	pCi/g
Radionuclide	Uranium-238	28	4	0	6.06	10.13	3.46	351	pCi/g
svoc	Anthracene	20	1	0	970	970		204000000	ug/kg
svoc	Benzo(a)anthracene	20	3	0	980	1400		34900	ug/kg
SVOC	Benzo(a)pyrene	20	1	0	1300	1300		3490	ug/kg
svoc	Benzo(b)fluoranthene	20	3	0	1000	1500		34900	ug/kg
svoc	Benzo(k)fluoranthene	20	3	0	870	1100		349000	ug/kg
svoc	bis(2- Ethylhexyl)phthalate	20	į į 1	0	1500	1500	-	1970000	ug/kg
SVOC	Chrysene	20	2	0	1140	1500	-	3490000	ug/kg
SVOC	Fluoranthene	20	7	0	1406	-3100	_	27200000	ug/kg
svoc-	Pyrene	20	7	0	1570	3900	-	22100000	ug/kg
VOC	Acetone	25	2	0	150	180	-	102000000	ug/kg
VOC	Methylene chloride	27	5	0	38.2	110		2530000	ug/kg
. 55	Toluene	27	2	. 0	76	140		31300000	ug/kg

Exceeds Wildlife Refuge Worker Action Level

Note: Analytes shown are those that were detected at least once above background levels and have a Wildlife Refuge Worker Action Level. The maximum concentration is the maximum detected value, and the average concentration is the average of the data that exceed background.

AL - Action Level

BG - Background

SD - Standard Deviation

Table 5 Summary of Constituents Above Background in Surface Soil

Table 5 Summary of Constituents Above Background in Surface Soil										
2 6 6 3 3	Analyte	Total Number	Number of	Number of	Average Conc.	Maximum Conc.	BG Mean	Wildlife Refuge	Unit	
// Group		Samples	Samples	Samples			🌯 Plus 💸	Worker AL		
		Analyzed	above BG but	above the AL	to serve		∴(2SD≋			
			below	THE AL		3 40 5 6				
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	A Company	160 413	the AL	3 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	<u> 18 - 21 - 21 - 21 - 21 - 21 - 21 - 21 -</u>	t	₹. × <u>X</u>			
Metal A	Nluminum	20	3	<u></u>	22333	27000	16902	228000	mg/kg	
Metal A	Antimony	24	7	0	4.84	14.3	0.47	409	mg/kg	
Metal A	Arsenic	24	2	0	10.95	11	10.1	22.2	mg/kg	
Metal B	Barium	24	6	0	545.50	772	141	26400	mg/kg	
Metal B	Beryllium	20	11	0	1.10	1.1	0.966	921	mg/kg	
Metal C	Cadmium	24	1	0	2.20	2.2	1.61	962	mg/kg	
Metal C	Chromium	25	9	0	42.18	74.6	16.99	268	mg/kg	
Metal C	Cobalt	24	2	0	11.30	11.5	10.91	1550	mg/kg	
Metal C	Copper	24	13	0	86.88	390	18.06	40900	mg/kg	
Metal I	ron	. 24	. 7	0	31971	58900	18037	307000	mg/kg	
Metal L	æad	24	4	0	121.78	186	54.6	1000	mg/kg	
Metal L	ithium	21	2	0	12.50	13	11.6	20400	mg/kg	
Metal N	Manganese	24	5	0	664	1190	365	3480	mg/kg	
Metal N	Nickel	24	11	0	31.20	68	14.9	20400	mg/kg	
Metal S	Strontium	24	9	0	131	284	48.9	613000	mg/kg	
Metal 1	Γin	24	1	0	4.75	4.75	2.9	613000	mg/kg	
Metal \	Vanadium	. 24	5	0	118	191	45,6	7150	mg/kg	
	Zinc	24	12	0	179	462	73.8	307000	mg/kg	
· · · · · · · · · · · · · · · · · · ·	Aroclor-1254	13	4	0	31.50	86	· 	12400	ug/kg	
	Aroclor-1260	13	3	1	18022	54000		12400	ug/kg	
	Americium-241	28	12	0	0.49	1.381	0.0227	76	pCi/g	
1	Plutonium-239/240	28	11	0	2.03	5.7456	0.066	50	pCi/g -	
a la company de la company	Uranium-234	28	11	0	3.63	5	2.25	300	pCi/g	
	Uranium-235	28	13	0	0.19	0.3	0.0939	8	pCi/g	
	Uranium-238	. 28	11	0	4.51	13.3	2	351	pCi/g	
	Acenaphthene	15	3	0	104	130	-	40800000	ug/kg	
	Anthracene	15	3	0	147	160	· •	204000000	ug/kg	
	Benzo(a)anthracene	15	5	0	469	880		34900	ug/kg	
the second control of the second control of	Benzo(a)pyrene	15	3	0	593	890	-	3490	ug/kg	
	Benzo(b)fluoranthene	15	4	0	585	1200	-	34900	ug/kg	
	Benzo(k)fluoranthene	15	4	0	420	440	-	349000 .	ug/kg	
The second second second	Benzoic Acid	14	1	0	440	440	-	1000000000	ug/kg	
	bis(2-				1			1070000		
	Ethylhexyl)phthalate	15	- 1	0	220	220	•	1970000	ug/kg	
svoc	Chrysene	15	5	0	498	870	· · · · · · · · · · · · · · · · · · ·	3490000	ug/kg	
SVOC	Di-n-octylphthalate	15	1	0	150	150		14700000	ug/kg	
SVOC	Dibenz(a,h)anthracene	1.5	2	. 0	78.00	90		3490	ug/kg	
svoc	Fluoranthene	; 15	5	0	1142	1900		27200000	ug/kg	
, 1	Fluorene Indeno(1,2,3-	15	3	0	79.33	100	-	40800000 34900	ug/kg ug/kg	
	cd)pyrene	15	4	0	318	670		22100000		
SVOC	Pyrene	1,5	5	0	936	1700		22100000	ug/kg	

Analyte Group	Analyte	Total Number Samples Analyzed	Number of Samples above BG but below	Number of Samples above the AL	Average Conc:	Maximum Conc.	BG Mean Plus 2SD	Wildlife Refuge Worker AL	Unit
			below the AL						
: VOC	Tetrachloroethene	5	2	0	25.50	43	-	615000	ug/kg

Note: Analytes shown are those that were detected at least once above background levels and have a Wildlife Refuge Worker Action Level. The maximum concentration is the maximum detected value, and the average concentration is the average of the data that exceed background.

AL - Action Level

BC Bedroom 1

- BG Background SD Standard Deviation

Table 6 Summary of Constituents Above Background in Subsurface Soil

Table 6 Sum	mary of Constituen	ts Above I	Sackground	ı in Subsu	riace Soli	Carlo Santakan dar	a DC	Wallance Co.	Unit
Analyte	Analyte		Number of	Number of	Average Conc.	Maximum Conc.	BG Mean	Wildlife Refuge	Unit
Group		Number Samples	Samples	Samples	Conc.	4 4 4 4 4 4	Plus	Worker AL	
NAME OF BOOK OF THE PARTY OF TH	2 AC 10 AC 1	Analyzed	above BG	above the			2SD		
	The state of the s		but below the AL	AL					
Frank Sales				231111111111111111111111111111111111111	62 S	2 × 8 1 10 ×	<u> </u>		a martina de la
Metal	Aluminum	42	5	0	42600-	50000	35373	228000	mg/kg
Metal	Arsenic	54	7	2	21.86	39	13.14	22.2	mg/kg
Metal	Barium	54	12	0	612	1060	289	. 26400	mg/kg
Metal	Cadmium	54	1	0	7.20 _	7.2	1.7	962	mg/kg
Metal	Chromium	54	11	1	408	408	68.27	268	mg/kg
Metal	Copper	54	11	0	76.47	122	38.21	40900	mg/kg
Metal	Lead	54	3	0	29.17	33.4	24.97	1000	mg/kg
Metal	Lithium	42	1	0	36.00	36	34.66	20400	mg/kg
Metal	Mercury	44	1	0	3.20	3.2	1.52	25200	mg/kg
Metal	Molybdenum	54	1	0	166	166	25.61	5110	mg/kg
Metal	Strontium	. 54	3	0	316	388	211	613000	mg/kg
Metal	Uranium, Total	33	1	0	4.00	4	3.04	2750	mg/kg
Metal	Vanadium	54	7	0	164	249	88.49	7150	mg/kg
Metal	Zinc	54	1	0	582	582	139.1	307000	mg/kg
PCB	Aroclor-1254	22	7	0	1671	4200		12400	ug/kg
PCB	Aroclor-1260	22	4	0	409	1500		12400	ug/kg_
Pesticide	4,4'-DDT	8	1	0	19.00	19		100000	ug/kg
Pesticide	Endosulfan II	8	1	0	12.00	12		`4420000	ug/kg
Radionuclide	Americium-241	61	12	0	2.47	16.8	0.02	76	pCi/g
Radionuclide	Plutonium-239/240	61	15	. 0	4.56	12.18	0.02	50	pCi/g
Radionuclide	Uranium-234	61	22	0	4.09	6.10	2.64	300	pCi/g
Radionuclide	Uranium-235	61	33	0	0.20	0.357	0.12	8	pCi/g
Radionuclide	Uranium-238	61	31	0	3.48	6.10	1.49	351	pCi/g
SVOC	2-Methylnaphthalene	17	3	0	837	1300		20400000	ug/kg
svoc	Acenaphthene	17	4	0	1099	2100	-	40800000	ug/kg
	Anthracene	17	4	0	1143	- 2100	-	204000000	ug/kg
SVOC	Benzo(a)anthracene	17	4	0	1853	3600	-	34900	ug/kg
SVOC	1	17	3	0	2180	3100	-	3490	ug/kg
SVOC	Benzo(a)pyrene Benzo(b)fluoranthene	17	4	0	1830	3600	-	34900	ug/kg
SVOC		17	4	0	758	1500	-	349000	ug/kg
SVOC	Benzo(k)fluoranthene bis(2-	-	-					1070000	
SVOC	Ethylhexyl)phthalate	17	1	0	150	150		1970000	ug/kg
SVOC	Chrysene	17	4	0	2095	4200		3490000	ug/kg
svoc	Dibenzofuran	17	3	0	753	1100		2950000	ug/kg
svoc	Fluoranthene	17	5	0	3300	8000	ļ -	27200000	ug/kg
SVOC	Fluorene	17	4	0	874	1700		40800000	ug/kg
svoc	Indeno(1,2,3- cd)pyrene	17	4	0	698	1400		34900	ug/kg
svoc	Pyrene	17	4	0	3505	6500	-	22100000	ug/kg
voc	1,1,1-Trichloroethane	74	2'	0	38.50	56		79700000	ug/kg
	1,2-Dichloropropane	74	1	0	71.60	71.6	-	345000	ug/kg
VOC		74	1	0	11.00	11	-	192000000	ug/kg
voc '	2-Butanone				11.370				

Añalyte Group	Analyte*	Total Number Samples Analyzed	Number, of Samples above BG but below the AL	Number of Samples above the AL	Average Conc.	Maximum Conc.	BG Mean Plus 2SD	Wildlife Refuge Worker AL	Unit		
voc	Acetone	74	8	0	16.33	66		102000000	ug/kg		
voc	Chloroform	74	2	0	37.00	57		19200	ug/kg		
VOC	Ethylbenzene	74	1	0	21.00	21		4250000	ug/kg		
VOC	Methylene chloride	74	8	0	10.93	20	-	2530000	ug/kg		
VOC	Naphthalene	80	7	0	1829	6200-		3090000	ug/kg		
VOC	Styrene	74	1	0_	i7.00	17		123000000	ug/kg		
VOC	Tetrachloroethene	74	8	0	202	610		615000	ug/kg		
VOC	Toluene	74	2 .	0	22.25	43		31300000	ug/kg		
VOC	Trichloroethene	74	2	0	93.50	120		19600	ug/kg		
voc	Xylene	74	2	0	66.05	110		2040000	ug/kg		
	Exceeds Wildlife Refuge Worker Action Level										

Note: Analytes shown are those that were detected at least once above background levels and have a Wildlife Refuge Worker Action Level. The maximum concentration is the maximum detected value, and the average concentration is the average of the data that exceed background.

- AL Action Level
- BG Background SD Standard Deviation























